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14 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

15 THOMAS W. MCNAMARA, as the Court-
Appointed Monitor for AMG Capital
16 Management, LLC, et al.,

17 Plaintiff,

18 v.

19 LINDA HALLINAN, et al.,

20 Defendants.

Case No. 2:17-cv-02967-GMN-BNW

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR
DEFENDANT CAROLYN HALLINAN
TO FILE RESPONSE TO PLAINTIFF'S
MOTION TO AMEND PROTECTIVE
ORDER**

(First Request)

Assigned to: Chief Judge Gloria M. Navarro

1 Plaintiff, Court-Appointed Monitor Thomas W. McNamara ("Plaintiff"), and Defendant
2 Carolyn Hallinan ("Defendant"), hereby stipulate to the following:

3 1. That the deadline for Defendant to file her response to Plaintiff's Motion to Amend
4 Protective Order, filed on June 11, 2019, is currently scheduled for June 25, 2019;

5 2. That Defendant requires additional time to respond beyond the current deadline in light
6 of the following: (i) Plaintiff received a subpoena from the U.S. Attorney's Office, Eastern District
7 of Pennsylvania, for documents produced in this case through discovery and that are subject to the
8 Protective Order; (ii) Defendant and Plaintiff are communicating with the Government regarding
9 the documents sought in an effort to reach an agreement which would render the need to amend the
10 Protective Order moot;

11 3. Therefore, Defendant shall have up to and including July 10, 2019, to file her response to
12 Plaintiff's motion.

13 Dated: June 25, 2019

Dated: June 25, 2019

14 McNAMARA SMITH LLP

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15 By: s/ Logan D. Smith

By: s/ Adam J. Petitt

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23 *Attorneys for Court-Appointed Monitor,*
24 *Thomas W. McNamara*

Attorneys for Defendant Carolyn Hallinan

25 **IT IS SO ORDERED:**

26 
27 UNITED STATES MAGISTRATE JUDGE

28 DATED: June 26, 2019

CERTIFICATE OF SERVICE

I am employed by the law firm of Semenza Kircher Rickard in Clark County, Nevada. I am over the age of 18 and not a party to this action. The business address is 10161 Park Run Drive, Suite 150, Las Vegas, Nevada 89145.

On the 25th day of June 2019, I served the document(s), described as:

**STIPULATION AND ORDER TO EXTEND THE DEADLINE FOR DEFENDANT
CAROLYN HALLINAN TO FILE RESPONSE TO PLAINTIFF'S MOTION TO
AMEND PROTECTIVE ORDER
(First Request)**

☒ by sending ☐ an original ☒ a true copy

☒ a. via **CM/ECF System** (*You must attach the "Notice of Electronic Filing", or list all persons and addresses and attach additional paper if necessary*)

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Attorneys for Thomas W. McNamara, in his capacity as Court-Appointed Monitor

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☐ b. **BY U.S. MAIL.** I deposited such envelope in the mail at Las Vegas, Nevada. The envelope(s) were mailed with postage thereon fully prepaid. I am readily familiar with Semenza Kircher Rickard's practice of collection and processing correspondence for mailing. Under that practice, documents are deposited with the U.S. Postal Service on the same day, which is stated in the proof of service, with postage fully prepaid at Las Vegas, Nevada in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date stated in this proof of service.

☐ c. **BY PERSONAL SERVICE.**

☐ d. **BY DIRECT EMAIL.**

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☐ e. **BY FACSIMILE TRANSMISSION.**

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Olivia A. Kelly

An Employee of Semenza Kircher Rickard